Zak Comment Received 10/6/2006

Dear Mr. Howatt,

I write as a founding member of Citizens for Clean Power because I feel that the citizens' interests are not being considered.

THERE IS AN ARTIFICIALLY LOW COST ESTIMATE FOR COAL IN THE BIDDING PROCESS BECAUSE NUMEROUS HEALTH COSTS AS WELL AS THE FUTURE COST OF THE CARBON TAX ARE NOT BEING INCLUDED. THE HIDDEN COST OF PASSING THE CARBON TAX ON TO THE CONSUMER, DEFINITELY NEGATES THE ECONOMIC VALUE OF COAL.

CARBON SEQUESTRATION WOULD BE VIRTUALLY IMPOSSIBLE AT THE INDIAN RIVER SITE, MEANING THAT CO2 WOULD NEED TO BE TRANSPORTED SOMEHOW, IN A TECHNOLOGY YET TO BE DESIGNED AND SEQUESTERED IN A LOCATION MILES FROM HERE. WHILE NO ONE CAN DENY THE NEED TO CLEAN UP CO2, IT IS UNWISE TO CONTINUE TO RELY ON COAL, WITH ALL ITS ATTENDANT INJURIOUS BY-PRODUCTS AND IT IS IMMORAL TO REQUIRE THE CITIZENS TO PAY FOR THE CARBON CLEAN -UP.

The citizens of Delaware must rely on the public service commission to protect their best interest when it comes to deciding which energy supplier WILL BEST MEET THE WELFARE OF THE CITIZENRY. The hidden tax to cleanup carbon could easily cost the consumer far more than the cost of just paying for their electric consumption. Furthermore, let's look into the future, say 100 years from now when the rising waters are lapping at the foundation of the Indian River coal plant. Who will pay? Who should pay for the lack of foresight?

The plant at Millsboro sits on the Indian River Inlet, and that bay, owing to the presence of the current coal plant is the one of the 10 most polluted bays in the country. If Sussex County is to remain economically sound for tourism and development, we must make certain that we do not add to the deterioration of the bay.

As you may know, NRG's public relations campaign seemed to suggest that it was building this new plant as a replacement for the old plant. Here is the bait and switch to the consumer. Citizens for Clean Power (with over 150 members) was pleased that the old plant would finally be cleaned up. After all, when the plant was in violation back in the 90's, plant officials kept pleading that they would be closing that plant in a few years, certainly by 2001. A blatant lie. Now, NRG is trying to get both DNREC's new regulations for the old plant both watered down and delayed. Coal lobbyists are working the Dover power structure, as usual. We are fearful that the hidden health costs borne by the citizens will continue.

Let me just mention some of the health costs and why they should be a bigger part of the picture. The health costs are hidden,

and consequently only the public Service Commission at this point can try to redress this issue. There is a 5 times greater

risk of disease and premature mortality within a 30 mile radius of the plant according to a Harvard Health Study, done in 2000.

5 times, not 2 times. Delaware's infant mortality rate in the most recent study I could find was 6th worst in the country.

DNREC's new regs do not address particulate matter, yet the EPA has concluded that fine particle pollution from the coal plants (PM2.5) shortens the lives of 95 Delaware residents each year, causes 13,000 lost work days, 87 hospitalizations and 2256 asthma attacks every year, 99 of which are so severe that they require emergency room visits. Mercury emissions form such stacks are a primary cause of neurological damage in children; infants living near stacks have a 26% increase in Sudden Infant Death Syndrome and as 40% increased risk of respiratory death. The American Lung Association in 2004-2005 gave

all 3 Dealawre Counties a grade of "F" for air quality.

The increased cost of educating children with autism, an ever increasing phenomena, especially in areas where

families live near old coal plants, is a hidden cost that must be considered. A retired EPA scientist in our group noticed that there were a significant increase in the number of children in special education classes in school districts downwind from the coal plant. There is tremendous personal heartache in raising a child with autism, and the taxpayer cost of educating an autistic child per year is \$80,000 vs.\$9000 for a standard student. Any amount of mercury is too much mercury to be spewed into the air and water. There are hidden costs to this lethal coal byproduct that must be factored into the cost of coal.

A number of organizations have joined our group in calling for cleaner air including Clean Air Council, Citizens for a Better

Sussex, the Sierra Club, the Audubon Society, Rehoboth Beach AARP, the American Lung Association, etc. The cleanest air possible could be available to all of Delaware if we were to give wind a fair shake in the bidding process. While the start-up costs might be somewhat greater, ultimately DE could sell wind to other states and thus bring money into state coffers. The long-term cost of wind is the true bargain because there are no hidden costs to the consumer related to shortened lives due to cancer, heart attacks, emphysema, asthma, etc. Furthermore, there is no hidden tax for carbon clean-up. When the health costs are truly considered wind power is most cost effective for the citizens of Delaware.

PLEASE GIVE WIND A FAIR CHANCE IN THE BIDDING PROCESS.

Sincerely, Kit Zak